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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

TIFFANY YIP, et al.,

Plaintiffs,

vs.

BANK OF AMERICA, N.A.,

Defendant.

Case No. 2:21-cv-01254-ART-EJY

Consolidated with:  
2:21-cv-02149-APG-BNW

**STIPULATION AND ORDER TO  
ALLOW SECOND AMENDED  
COMPLAINT AND EXTEND TIME TO  
RESPOND TO THE COMPLAINTS**

**(First Request)**

A.M. HAMILTON, KEVIN JOHNSON,  
KRISTIN JONES, and NIKITA WHITE,  
individually, and on behalf of themselves and  
all others similarly situated,

Plaintiffs,

vs.

BANK OF AMERICA, N.A.,

Defendant.

Case No. 2:22-cv-00374-ART-EJY

Plaintiffs Tiffany Yip, et al. and A.M. Hamilton, et al. ("Plaintiffs") and Bank of America, N.A. ("Defendant," and together with Plaintiffs, the "Parties"), by and through their respective counsel, hereby submit this stipulation to allow Plaintiffs to file Second Amended Complaints and for an extension of time for Defendant's forthcoming motions to dismiss the anticipated Second Amended Complaints. This is the first request for an extension of these response

1 deadlines, which were set forth in the Court's August 9, 2024 Order ruling on Defendant's  
2 Motions to Dismiss and Plaintiffs' Motion for Leave to Submit Supplemental Authority  
3 ("Order"). *See Yip*, ECF No. 60, *Hamilton*, ECF No. 39.

4 The Court's Order allowed Plaintiffs to file an Amended Complaint or a Status Report  
5 within 30 days of the date of the Order. *Yip*, ECF No. 60, *Hamilton*, ECF No. 39. Accordingly,  
6 Plaintiffs' Amended Complaint is due by September 9, 2024. If Plaintiffs file their Second  
7 Amended Complaint on September 9, 2024, then Defendant's motion to dismiss the Second  
8 Amended Complaint would be September 23, 2024. *See Fed. R. Civ. P. 15(a)(3)*.

9 In order to ensure cohesion of deadlines, to allow Plaintiffs sufficient time to  
10 meaningfully amend their complaints, and for Defendant to review and respond to the  
11 forthcoming amended complaints, the Parties have agreed to the following schedule:

- 12 1. Plaintiffs, pursuant to Rule 15(a)(2), will file their Amended Complaints by  
13 October 8, 2024;
- 14 2. Defendant's anticipated motions to dismiss the Amended Complaints shall be due  
15 on November 22, 2024;
- 16 3. Plaintiffs' opposition(s) to Defendant's motion(s) to dismiss shall be due on  
17 December 20, 2024;
- 18 4. Defendant's reply brief(s) in support of its motion(s) to dismiss shall be due on  
19 January 24, 2025.

20 IT IS SO STIPULATED.  
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1 Dated: September 4, 2024

Dated: September 4, 2024

2 By: /s/ George Haines

By: /s/ Kelly H. Dove

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17 By: /s/ George O. West III

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**IT IS SO ORDERED.**

  
**U.S. MAGISTRATE JUDGE**

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**Date: September 4, 2024**

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27 *Johnson, Kkristin Jones, and Nikita White*